

3.

The facts contained in this affidavit are true and correct, and unless otherwise noted, are based upon my personal, direct knowledge.

4.

I am the *pro-se* Plaintiff in the above-captioned action. I am also seeking appointment as counsel for a putative class of similarly situated individuals. This affidavit is being submitted to provide the Court with information regarding service of the Summons and Verified Complaint filed in this action on the Defendant, Yakim Manasseh Jordan.

5.

Yakim Manasseh Jordan is a Christian minister and self-proclaimed prophet known to many as "Prophet Manasseh Jordan." (*See* Manasseh Jordan Ministries Website, About the Prophet, <https://prophetmanasseh.com/aboutprophet - content> (last visited March 1, 2017).) According to his ministry's website, Mr. Jordan "went through extensive and intensive training under the leadership of the Holy Spirit, for the express purpose of understanding the prophetic office and ministry. This training has enabled him to move in the realm of accurate prophetic ministry." (*See id.*)

6.

Immediately upon the filing of the Verified Complaint, I transmitted copies of the summons and complaint to the Sheriff's Office of Broward County, Florida to serve on Defendant at his residence, which I had identified as being located at 12220 NW 68th Ct., Parkland, FL 33076. I reached this conclusion after scouring internet based search engines and websites, including Lexis Nexis's Public Records database, for information regarding Defendant's place of residence.

7.

On December 19, 2016, Officer Rita McCafferty, a Broward County Sheriff's Deputy, attempted to serve Defendant at 12220 NW 68th Ct. Officer McCafferty's Affidavit regarding this service attempt has already been filed with the Court as Document No. 7 on the case docket. In her Affidavit, Office McCafferty states that she observed vehicles registered in Defendant's name parked in the driveway of the residence, but an individual who she spotted exiting the driver's side of one such vehicle claimed not to know Defendant. Consequently, Officer McCafferty left her card on the front door of the residence.

8.

Later that day Officer McCafferty received a phone call from a Florida attorney named Robert Seibel. Mr. Seibel informed Officer McCafferty that he was

calling on behalf of Kingdom Ministries Church, Inc. (as its Secretary and CFO), a Georgia non-profit corporation formed in December 2015, which purchased 12220 NW 68th Ct. in June 2016 for \$2,650,000.00. [See Doc. No. 7-1.] (As a side note, the principal office address that Kingdom Ministries Church supplied to the Georgia Secretary of State is 194 Jonesboro Road, Jonesboro, GA, 30236. A street view search of that address on Google maps reveals that an [automotive parts and sales business](#) is located there.)

9.

Mr. Seibel is also one of Defendant's attorneys. In the past, Mr. Seibel was granted limited power of attorney to conduct a real estate transaction on Defendant's behalf, and Mr. Seibel's office address was listed as Defendant's address in court documents filed by Defendant in a case brought against him in June or July 2016 in Broward County Circuit Court for traffic code violations.

10.

According to Officer McCafferty, Mr. Seibel provided her with an address in New Jersey (*i.e.*, 1 High Meadows Road, Sadle River, NJ 07458) for serving Defendant with process. Upon receiving this information, the Broward County Sheriff's Office ceased attempting to serve Defendant at the 12220 NW 68th Ct. address.

11.

A search of the Bergen County, New Jersey, property records confirmed that that the residence located at 1 High Meadows Road, Sadle River, NJ 07458 is currently owned by Bernard Jordan. Bernard Jordan is Defendant's father, and also claims to be a "prophet." In July 2010, the Federal Communications Commission issued a citation against Bishop Bernard Jordan for violating the Telephone Consumer Protection Act ("TCPA") by placing autodialed and prerecorded calls, similar to those placed by Defendant herein, to wireless and residential phones.

12.

On January 10, 2017, Manny Bayo, a professional process server based in New Jersey, left copies of the summons and complaint in this action with a man who identified himself as the owner and a resident of 1 High Meadows Road, but who also claimed not to know anyone by the name of Yakim Manasseh Jordan. Mr. Bayo's proof of service was filed in this action on January 16, 2017 as Document No. 8.

13.

Meanwhile, I was still attempting to serve Defendant personally. To that end, I paid a process server based out of Jacksonville, Florida to attempt to serve Defendant at an event held at The House of Prayer in Jacksonville on Saturday,

January 9, 2017. I have been told that the process server, Aqualla D. Stephen, was immediately greeted with contempt from the attending audience, which, together with Defendant's entourage, thwarted her attempts gain access to Defendant. The best attempt landed Ms. Stephen close enough to recognize Defendant from pictures, but too far to get his attention. She unsuccessfully attempted to make contact for an hour at the event. A true and correct copy of the Return of Service provided by Ms. Stephen is attached hereto as [Exhibit A](#).

14.

In addition to sending a process server to the Jacksonville event, I hired private process servers to attempt service on Defendant at 12220 NW 68th Ct., Parkland, Florida. The first process server, Josh Wright, was unable to perfect service because each time he attempted service nobody was home. However, Mr. Wright spoke to Heron Bay East security (Heron Bay East is the name of the subdivision in which 12220 NW 68th Ct. is situated), who confirmed that security had Defendant and Defendant's brother, Aaron, listed as residents of 12220 NW 68th Ct.

15.

On January 21, 2017, another process server, Roy Bates, successfully perfected service of the summons and complaint on an individual who identified

himself as a resident of 12220 NW 68th Ct. Mr. Bates' account of that event is contained in the Return of Service attached hereto as [Exhibit B](#).

16.

A few days later, on January 26, 2017, Mr. Seibel left voicemails on my mobile and office telephone lines. Mr. Seibel presumably gleaned my mobile number by reading the complaint. I returned Mr. Seibel's voicemails that same day. During that conversation, which lasted about five (5) minutes, Mr. Siebel indicated that Defendant's "residence" is located at 1 High Meadows Road, Sadle River, NJ, and that Defendant does not live at 12220 NW 68th Ct., Parkland, FL.

17.

I also requested that Defendant accept and waive formal service pursuant to Fed. R. Civ. P. 4(d) by mailing via U.S.P.S. Priority Mail (with restricted delivery and adult signature required) the required notice and waiver to Defendant at 12220 NW 68th Ct., Parkland, FL. According to the *Mailing Standards of the United States Postal Service*, Domestic Mail Manual (DMM), section 503.8.1.3:

Adult Signature service provides electronic confirmation of the delivery or attempted delivery of the mailpiece and signature of the recipient, who must be 21 years of age or older. Prior to delivery, the recipient must furnish proof of age via a driver's license, passport, or other government-issued photo identification that lists age or date of birth. The USPS maintains a record of delivery (including the recipient's signature) for two years. The Adult Signature options are:

Adult Signature Required — provides delivery to a person who is 21 years of age or older. Upon delivery, an adult who is 21 years of age or older must provide one of the forms of identification listed above and provide a signature for receipt of the mailpiece.

Adult Signature Restricted Delivery—provides Adult Signature Required with the additional restriction of limiting delivery to a specific addressee or authorized agent who is 21 years of age or older. If the specific individual is not 21 years of age or older, the mailpiece will be returned to sender.

(See <http://pe.usps.com/text/dmm300/503.htm> - [ep1233286](#), last accessed on March 15, 2017.)

18.

Defendant did not respond to the waiver request. However, the U.S.P.S. provided the confirmation that the request was delivered to and signed for by Yakim Jordan on December 16, 2016. (See page 22 of 22 of Document No. 6, filed Jan. 16, 2017.)

19.

On February 25, 2017, I sent a copy of Plaintiff's Motion for Class Certification to Defendant at 12220 NW 68th Ct., Parkland, FL - also by U.S. Priority Mail, Adult Signature Restricted Delivery. Once again, the U.S.P.S. provided confirmation, attached hereto as [Exhibit C](#), that the item was delivered to and signed for by Yakim Jordan on March 1, 2017.

20.

Despite having been served with the Summons and Verified Complaint on January 10, 2017 and January 21, 2017, Defendants has not served a response within the time allowed by law. Nor has defendant sought additional time within which to respond.

FURTHER AFFIANT SAYETH NOT.

This 15th day of March, 2017.



Michael Ryan Peacock

SWORN to and subscribed before me
this 15th day of March, 2017.



Notary Public

[Notarial Seal]



My Commission Expires: _____

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing AFFIDAVIT REGARDING SERVICE and EXHIBITS A-C thereto upon all parties by depositing copies of same in the United States mail in an envelope with sufficient postage thereon addressed as follows:

Yakim Manasseh Jordan
c/o Robert Seibel
3019 Exeter B
Boca Raton, FL 33434

Yakim Manasseh Jordan
12220 NW 68th Ct.
Parkland, FL 33076-3340

Yakim Manasseh Jordan
1 High Meadows Road
Sadle River, NJ 07458

Dated: March 15, 2017

Respectfully submitted,

s/ Michael Ryan Peacock

Counsel for Plaintiff

Georgia Bar No. 001356

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